

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

DINA EL MAHDY

Plaintiff

v.

Case No. 20-cv-2715 SAG

MORGAN STATE UNIVERSITY

Defendants

* * * * *

MOTION TO WITHDRAW APPEARANCE

Pursuant to Local Rule 101.2, Donald G. Quinn, and the firm of Quinn, L.L.C., Counsel for Dina El Mahdy (“Plaintiff”) move to withdraw their appearance as counsel in the above-captioned matter, and for reasons state as follows:

1. Plaintiff, Dina El Mahdy, initiated this matter by filing a *pro se* complaint with the Court on September 18, 2020.
2. While this matter was pending in the United States District Court, Donald G. Quinn, and the firm Quinn, L.L.C., entered their appearance in this matter for Plaintiff on August 16, 2021.
3. In compliance with Local Rule 101.2, on March 10, 2022, the Counsel sent a letter via email and first-class mail to Plaintiff stating his intention to file a motion to strike his appearance in this matter.
4. The letter of March 10, 2022, states undersigned Counsel’s intention to strike his appearance as its attorneys of record in this action and advises the

Plaintiff to have another attorney enter their appearance on their behalf or that they would be proceeding *pro se*.

5. Counsel has provided the Plaintiff with at least seven (7) days prior notice of their intention to withdraw.

6. Striking Counsel's appearance in this matter would not cause undue delay, prejudice, or injustice because the deadlines have been extended several times, discovery is substantially completed, and prior to counsel's appearance Plaintiff represented herself *pro se* for eleven months.

7. Under Rules of Professional Conduct, MD Rules Attorneys, Rule 19-301.16(b)(4),(6), and (7), binding upon member of the Maryland Bar whether they appear in state or federal court, an attorney may ethically withdraw from representation if "the client insists upon action or inaction that the attorney considers repugnant or with which the attorney has a fundamental disagreement."

8. Under Rules of Professional Conduct, MD Rules Attorneys, Rule 19-301.16(b)(6), an attorney may ethically withdraw from representation if "the representation will result in an unreasonable financial burden on the attorney or has been rendered unreasonably difficult by the client."

9. Under Rules of Professional Conduct, MD Rules Attorneys, Rule 19-301.16(b) (7), an attorney may ethically withdraw from representation if, "other good cause for withdrawal exists."

10. Matters have arisen between Counsel and Plaintiff which make it impossible to continue.

11. The interests of all Parties would be best served if this motion was granted.

12. Plaintiff's last known address is:

Dina El Mahdy
1114 W. Joppa Road
Towson, MD 21204

Dated: 3/17/2022

Respectfully Submitted,

/s/ Donald Quinn
Donald Quinn, Fed. Bar No. 22324
1629 K Street, Suite 300
Washington, D.C. 20006
(202) 508-3644
donquinn@thequinnlawgroup.com

RULE 101.2 CERTIFICATION

I, Donald G. Quinn, certify that on March 10, 2022, I sent a letter to Dina El Mahdy indicating that I and Quinn, L.L.C., who had previously entered their appearance on behalf of the Plaintiff (*i.e.*, Dina El Mahdy) would file a motion with the Court seeking to Strike their appearance for the Plaintiff and that Plaintiff should either retain new counsel or proceed *pro se*.

/s/ Donald Quinn
Donald Quinn

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2022, a copy of the foregoing Motion to Withdraw Appearance was served via email and first-class mail, postage paid upon:

Dina El Mahdy
1114 W. Joppa Road
Towson, MD 21204
dina.elmahdy@gmail.com

/s/ Donald Quinn
Donald Quinn